

**United States Bankruptcy Court
Eastern District of Pennsylvania**

In re:

Alonzo Workman,
Darlene Workman,

Debtors.

Case No. 22-12357-pmm

Chapter 13

**Debtors' Motion to Approve Next Friend
and Waive Financial Management Course Requirement**

AND NOW, Debtors Alonzo Workman and Darlene Workman, by and through their attorney, state as follows:

1. The Court may approve a Next Friend to represent the interests of a debtor who is unable to do so themselves under certain circumstances. Fed. R. Bankr. P. 1004.1; 11 U.S.C. § 109(h)(4); *Gardner v. Parson*, 874 F.2d 131, 139 (3d Cir. 1989); Pa. R. Civ. P. 2051.

2. Joint Debtor Darlene Workman died on January 13, 2024. Because Darlene Workman's death leaves her unable to represent her interests in this bankruptcy case, the Court should approve a next friend to do so for her.

3. The Court should approve Victoria Workman, Darlene Workman's daughter, as next friend because she is best qualified to represent her mother's interests in this bankruptcy case.

4. The Court should also waive Darlene Workman's obligation to complete a pre-discharge financial management course as allowed under 11 U.S.C. § 1328(g)(2).

NOW, THEREFORE, the Debtors ask this Court to grant relief in the form of order attached and to grant such other relief in their favor as may be necessary and proper under the law.

Date: February 11, 2024

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